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July 5, 2023

**VIA ECF**

Hon. John P. Cronan  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: *FoxMind Canada Enterprises Ltd. v. ACEXL, et al.***  
**Case No. 23-cv-1764 (JPC)**  
**Request for Extension of Time to File Motion for Default Judgment**

Dear Judge Cronan,

We represent Plaintiff FoxMind Canada Enterprises Ltd. (“Plaintiff”) in the above-referenced action.<sup>1</sup> By Order dated May 11, 2023, the Court directed Plaintiff to file a Motion for Default Judgment in this action by no later than July 7, 2023. Plaintiff respectfully requests a short extension of time to file its Motion for Default Judgment until Friday July 21, 2023.

In accordance with Your Honor’s Individual Rules and Practices, Plaintiff respectfully submits the following:

- i. **The original date(s) set for the appearance or deadline(s) and the new date(s) requested:** July 7, 2023
- ii. **The reason(s) for the request:** Plaintiff is engaging in productive settlement discussions with several Defendants. While none of the Defendants have indicated any intention to formally appear in this action, Plaintiff respectfully requests that the Court allow Plaintiff additional time to reach amicable resolutions with these Defendants prior to moving for Default Judgment
- iii. **The number of previous requests for adjournment or extension:** None, this is Plaintiff’s first request for an extension of time to file its Motion for Default Judgment
- iv. **Whether these previous requests were granted or denied:** N/A
- v. **Whether opposing counsel consents, and, if not, any reasons given by opposing counsel for refusing to consent:** None of the Defendants remaining in this action have filed Answers or otherwise formally appeared, and are all currently in default, thus Plaintiff did not seek their consent

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<sup>1</sup> Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary.

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We thank the Court for its time and attention to this matter.

Respectfully submitted,

**EPSTEIN DRANGEL LLP**

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*Attorneys for Plaintiff*

The request is granted. The default judgment schedule is adjourned as follows: Plaintiff shall file its motion for default judgment and supporting papers by July 21, 2023. Plaintiff shall serve Defaulting Defendants with its Default Judgment motion papers via the method of service outlined in the Preliminary Injunction, *see* Dkt. 19, and file proof of such service by July 28, 2023. Defaulting Defendants' deadline to oppose the motion is adjourned to August 4, 2023, and Plaintiff's deadline to reply is adjourned to August 11, 2023. Plaintiff shall serve Defaulting Defendants with a copy of this order via the method outlined in the Preliminary Injunction, *see* Dkt. 19, and file proof of such service within one week.

SO ORDERED.

July 6, 2023

New York, New York



JOHN P. CRONAN

United States District Judge